

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

to Elizabeth Gilpin

Case No. \_\_\_\_\_]

**COMPLIANCE STATUS REPORT**

Date of Report 6-12, 19 98 at 10 a.m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerry Brown, E H &amp; S Mgr</u>
Location <u>3801 E. Marginal Wy S</u> <u>Seattle, WA 98134</u> <u>206-623-5596</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

Dust emissions from G-cooler baghouse.  
Corrective action commenced during inspection.  
Please send response on what preventative  
measures will be implemented to minimize  
chance of recurrence. (Reg I Sect. 9.20 & 5.05(e))

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: MM Gilpin

Received by: [Signature]  
Signing this is not an admission of guilt





Seattle Plant

**facsimile**  
TRANSMITTAL

**to:** Ms. Elisabeth Gilpin  
Puget Sound Air Pollution Control Agency

**fax:** 343-7522

**re:** CSR June 12, 1998

**date:** June 30, 1998

---

As you witnessed on June 12, 1998, an event occurred in the G-Cooler dust collector bag house when a blow pipe disengaged causing dust emission. This event was quickly remedied and found to have been caused by compression nuts that loosened enough to allow the blow pipe to disengage. This has not occurred before.

To prevent a reoccurrence, these blow pipes will be checked periodically for tightness by the dust collector specialist

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

AGCS2M000704

June 24, 1998

Ms. Elisabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Request for Compliance Status

Dear Ms. Gilpin:

You requested information on plant operations for July 20, 21, 22, 1998.

July 21

Dust collector 474.141: This D/C located on top of the clinker storage silos (six pack) was shut down shortly after 3:00 p.m. on July 20 upon confirmation of it dusting. It remained off line until the following day. On July 21, Mr. Jim Langley and Todd McNitt inspected the both the dirty and clean side of 474.141 dust and did not find any obvious problems. The traveler and blow back fan were operating without problems. There was some residual dust in the clean side and the bags were pretty caked up on the dirty side. They shook down and cleaned the bags, closed the D/C up and ran in local. There was an initial puff of dust when it first started, but cleared up quickly. They observed the vent for approx. 20 minutes and did not see any more dusting.

Visible emissions from the main stack: Coinciding with your report, main baghouse compartment 11 was being put on line after several days of extensive maintenance. The act of placing the compartment on line is believed to have caused a spike but there was no opacity violation recorded by the COM monitor at that time during this day.

Operational status Kiln up; Raw mill up, Both finish mills operating.

July 21

Operational status Kiln up; Raw mill up, Both finish mills operating  
No dust emissions events were reported.

July 22

Operational status Kiln up; Raw mill up Both finish mills operating  
No dust emissions events were reported.



Seattle Plant

**facsimile**  
TRANSMITTAL

**to:** Elizabeth Gilpin

**fax:** PSAPCA 343-7522

**re:** Compliance Status

**date:** Monday, July 27, 1998

**number of pages including this page:** 2

Per your request. Please call if you have further questions.

Jerry

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

Author: Jim Langley at AGC-SEA  
Date: 7/21/98 2:29 PM  
Priority: Normal  
TO: Jerry Brown  
Subject: 474.141 D/C

Jerry,

Todd and I have just completed an inspection of the dust collector on top of the six pack. We opened both the dirty and clean side. Did not find any obvious problems. Traveler and blowback fan were operating OK. There was some residual dust in the clean side. The bags were pretty caked up on the dirty side. Shook down and cleaned the bags. Closed it up and ran in local. There was an initial puff of dust when it first started, but cleared up quickly. Observed for aprox. 20 minutes and did not see any more dusting.

I think the buildup caused the bags to plug, and therefore it was just pulling dust from the residual dust in the clean side. After we cleaned bags and put back on line our DP was 1.5". I informed John Hoffman that it was back on line so he could keep an eye on it for signs of dusting again. Should be good to go.

Jim

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

*Melissa McAfee*

Registration No. \_\_\_\_\_

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report 7/28, 19 98 at 3:24-3:47 p.m.

Source Name <i>Ash Grove Cement Co.</i>	Responsible Person, Title <i>Gerald Brown, EH+SM</i>
Location <i>3801 E. Marginal Wy S Seattle, WA 98134</i>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

*Dust emissions from vent from dust collector over clinker silo 4. Please report corrective action + problem identified. Also send O&M log showing O&M activity on this dust collector for June + July 1998.*

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by:

*M McAfee*

Received by

*[Signature]*

Signing this is not an admission of guilt

# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington, 98101-2038

Fax 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

## COMPLIANCE STATUS REPORT

Date of Report 7/20, 19 98 at 2:34-2:46 p.m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerald Brown, E H + S Mgr</u>
Location <u>3801 E. Marginal Wy S</u> <u>Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

Continuous emissions of particulate from  
both the main stack and from side vent on  
clinker silos. (see attached photos). (Reg I Sect. 9.20)  
Heavy fallout accumulation (up to ~1/3 inch)  
which was clinker like in appearance & by  
gritty texture on about 25 cars parked  
at Bays A+B at Terminal 106. (Reg I Sect 9.11)

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by

7-31-98

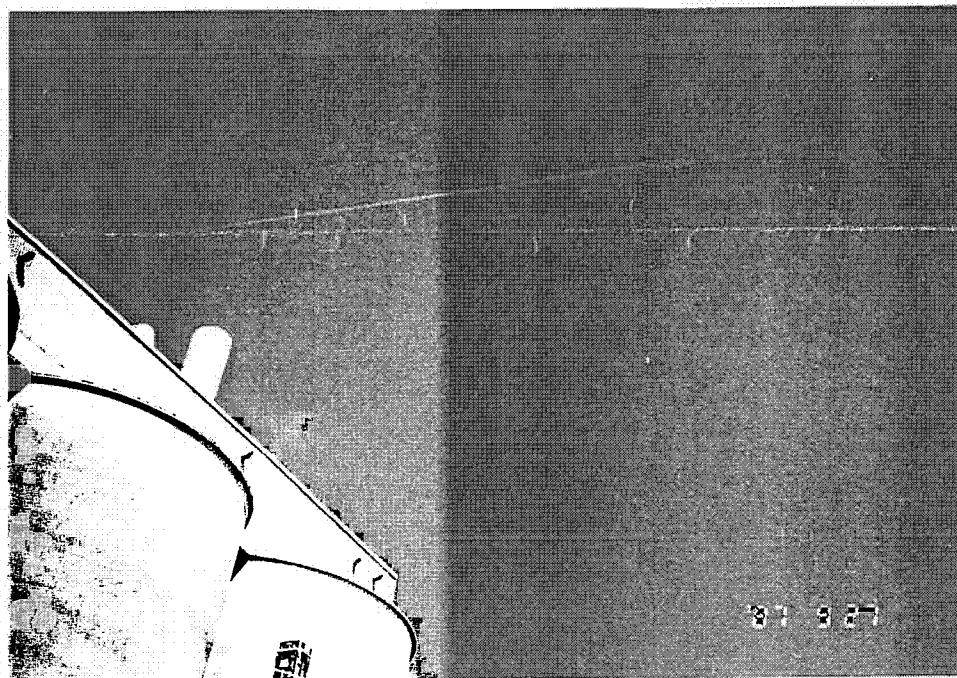
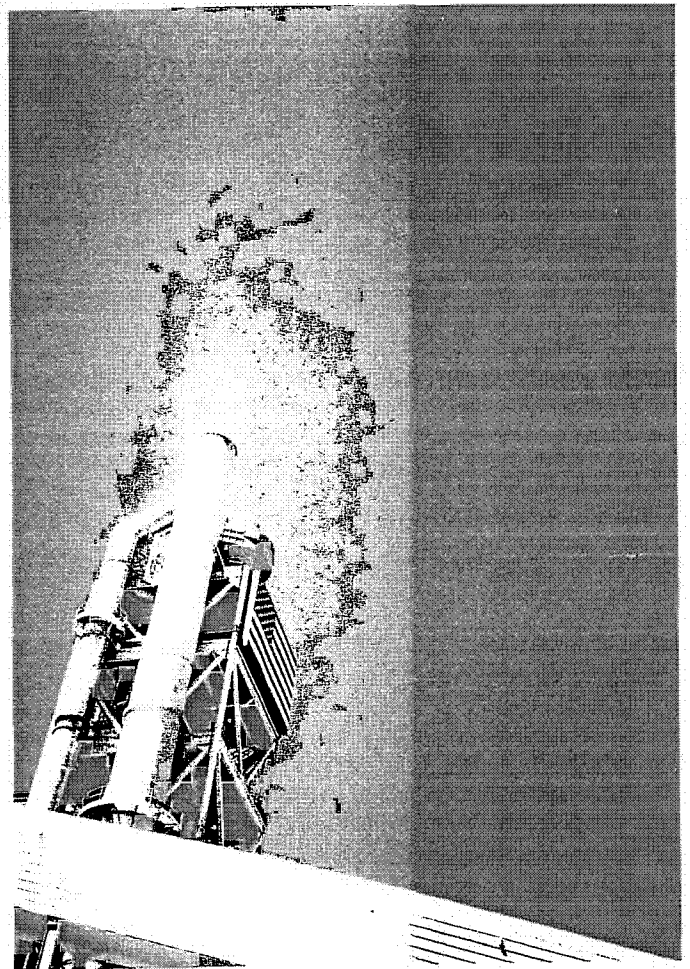
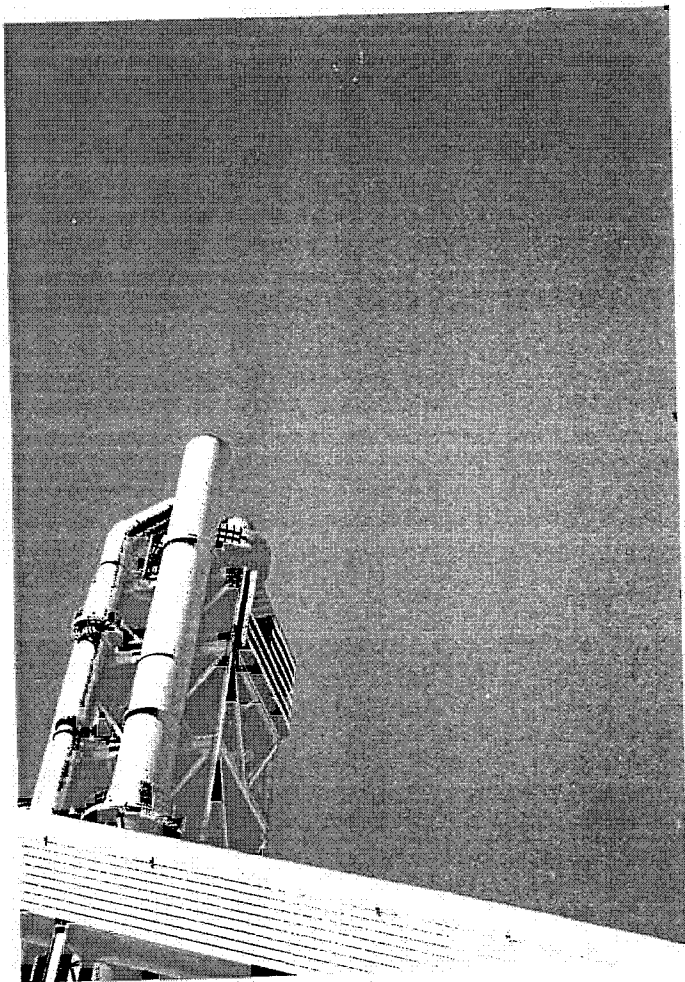
Form No. 70-182

(7/1/93)

Received by

Signing this is not an admission of guilt

AGCS2M000709







Seattle Plant

**facsimile**

TRANSMITTAL

to: Melissa McAfee

fax: PSAPCA 343-7522

re: CSR 7/28 and 7/20

date: Tuesday, August 04, 1998

number of pages including this page: 2

Please find attached responses to the above CSRs. The 7/20 response had been faxed to Elisabeth as requested July 24.

If you need further information please call.

Jerry

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

AGCS2M000711

August 4, 1998

Ms. Melissa McAfee  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Compliance Status Report 7/28/98

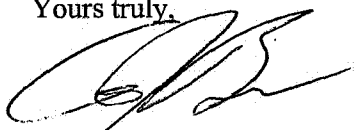
Dear Ms. McAfee:

The Compliance Status Report dated 7/28/98 requests information on plant operations for the dust collector over clinker silo 4.

D/C 474.140 located on top of the clinker silos was shut down following your report. It was inspected on 7/30 and found to have a broken bag. The cause of the bag failure is unknown and is not associated with the 7/21 cleaning as speculated. To prevent a possible reoccurrence, this dust collector is to be re-bagged next week.

Please note that two individuals observed this bag house prior to your report. Mr. Roger Bliss, Dust Collector Specialist reports in the (attached) that he did not observe any dust while conducting his morning walkthrough on 7/28. Mr. Tom Adelman Production Control Shift Lead reported that he observed the dust collector at @ 2:00 p.m. 7/28 specifically for emissions and did not see any.

Yours truly,



Gerald J. Brown  
Manager, Safety and Environmental

Copy: HV

AGCS2M000712

474. 140

Main Baghouse Module Inspection Sheet		
Date	Module	Remarks
05-06-98		I Inspected and cleared up this d/c bag. I found that it is operating very well. D.P. is great, GT is clean on the inside, no bags blocked off. I cleared up the whole area if material.
07-21-98		Todd Mcnitt and Jim L. Inspected this d/c. They shook down the bags and found <del>no</del> light dust <del>on</del> on the clean side of the d/c. d/c tested o.k.
07-30-98		d/c had been shut ↓ P.S.A. P.C.A. Reported It to be dusting. I did not observe any dusting in the a.m. during my morning walk through. Tom Adelman never saw any dusting earlier in the day. 7-30-98 after d/c had been shut ↓ For a few days we went in to inspect. We found a tear in a bag. The bag was probably torn when the d/c was inspected and shook down on 07-21-98 by Todd Mcnitt and Jim L. <del>The</del> d/c is going to be Re-bagged For P.M. Last bag change out was 10-29-95 by John Dallas.

July 24, 1998

Ms. Elisabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Request for Compliance Status

Dear Ms. Gilpin:

You requested information on plant operations for July 20, 21, 22, 1998.

July 20

Dust collector 474.141: This D/C located on top of the clinker storage silos (six pack) was shut down shortly after 3:00 p.m. on July 20 upon confirmation of it dusting. It remained off line until the following day. On July 21, Mr. Jim Langley and Todd McNitt inspected the both the dirty and clean side of 474.141 dust and did not find any obvious problems. The traveler and blow back fan were operating without problems. There was some residual dust in the clean side and the bags were pretty caked up on the dirty side. They shook down and cleaned the bags, closed the D/C up and ran in local. There was an initial puff of dust when it first started, but cleared up quickly. They observed the vent for approx. 20 minutes and did not see any more dusting.

Visible emissions from the main stack: Coinciding with your report, main baghouse compartment 11 was being put on line after several days of extensive maintenance. The act of placing the compartment on line is believed to have caused a spike but there was no opacity violation recorded by the COM monitor at that time during this day.

Operational status Kiln up; Raw mill up, Both finish mills operating.

July 21

Operational status Kiln up; Raw mill up, Both finish mills operating  
No dust emissions events were reported.

July 22

Operational status Kiln up; Raw mill up Both finish mills operating  
No dust emissions events were reported.

# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington, 98101-2038

Fax 206-343-7522

Registration No. 11339

McAfee

Case No. \_\_\_\_\_

## COMPLIANCE STATUS REPORT

Date of Report 8-14, 19 98 at 1:57 p.m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, P.H.Mgr</u>
Location <u>3801 E. Marginal Wy S</u> <u>Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

Visible emissions observed over clinker  
storage silos on 8/14/98 at 1:57 p.m.  
Please report the cause of the problem  
and corrective actions taken.

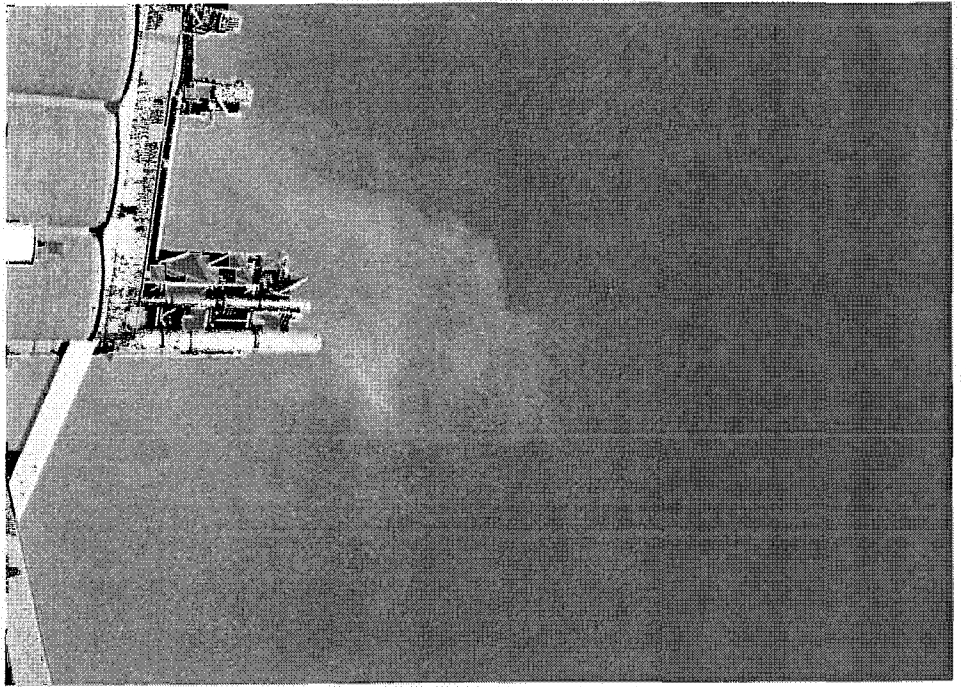
Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

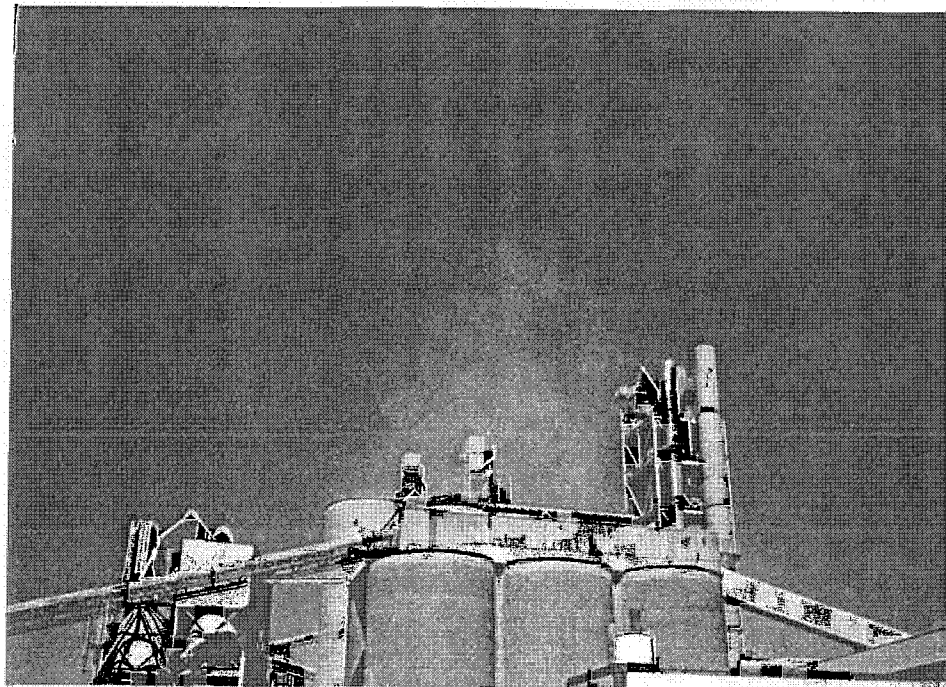
Issued by

McAfee  
9.3.98

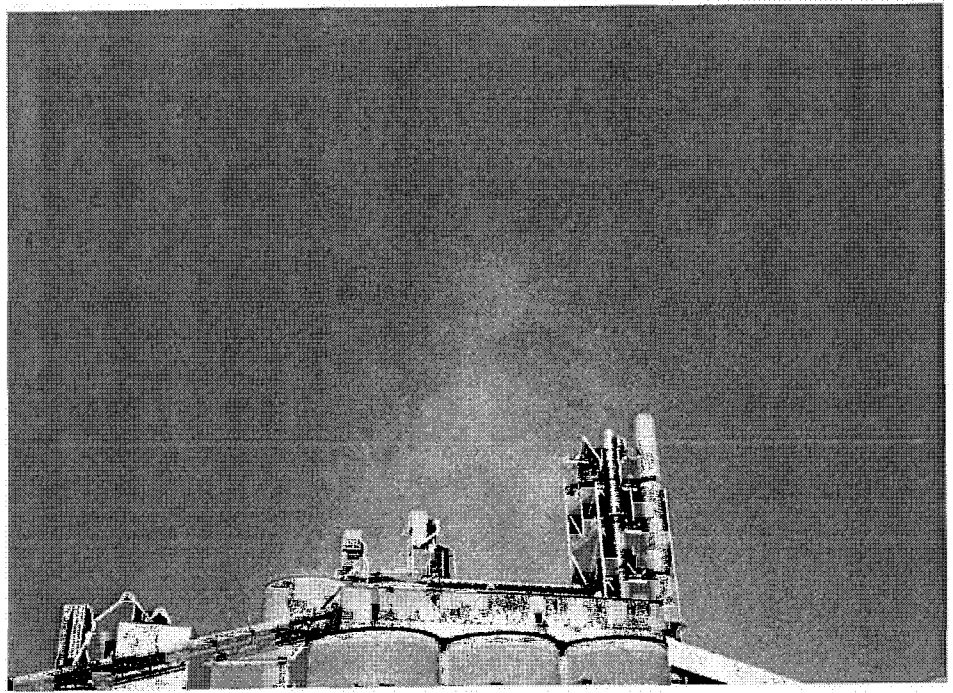
Received by

Signing this is not an admission of guilt





AGCS2M000717



AGCS2M000718



# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

September 17, 1998

Ms. Melissa McAfee  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Compliance Status Report

Dear Ms. McAfee:

You requested information on causes and corrections for emissions observed over the clinker silos on August 14, 1998.

The emission was caused by a faulty high-level bin indicator which lead to over filling the hydrated lime tank. The bin high level switch has been repaired.

As you are aware, we have been in the process of installing load cells on the lime tank for determining volume. Electrical wiring and structural modifications to X-bracing on the tank have been completed. The project will be completed with the placement of the load cells. Following testing, the system should be completely functional within 2-3 weeks.

Yours truly,

Gerald J. Brown  
Manager Safety and Environmental

Copy: HV  
MD

AGCS2M000719



Seattle Plant

**facsimile**

TRANSMITTAL

to: Melissa McAfee PSAPCA

fax: 343-7522

re: CSR

date: Thursday September 17, 1998

Number of pages including this page: 2

Following is the information you requested. I am sorry for the delay.

If you need further information please call.

Jerry

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

AGCS2M000720

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

October 13, 1998

Ms. Elisabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Dear Ms. Gilpin:

Below is the information you requested on the plant status and barge unloading process during the dates specified in September 1998.

September 3, 1998

The kiln process was operating normally. No upset events or emissions were reported.

September 11, 1998

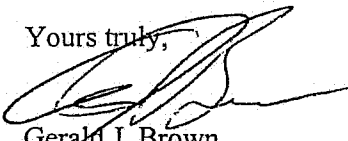
A lime stone barge arrived full on 9/10 at 8:20 a.m. and departed empty on 9/11 at 12:30 p.m. During the unloading, water was being applied for dust control at all points between the barge and the stockpile. These locations include the hopper receiving from the barge, Transfer tower #10A, Transfer Tower #2 and the stacker. No dust emissions were noted.

On the morning of 9/11, barge unloading was nearly complete and the water sprays on the hopper was turned off to prevent water discharge into the river. At this point some dust generation was observed when the loader dumped material into the hopper. During this period, material offloading is intermittent as the loader is scraping up the remnants of the load. Normally, water that is applied at the receiving hopper for dust control is entrained with the material but when offloading rate is intermittent, the belt can run empty allowing the water to fall off.

Limestone when received typically contains sufficient moistures that limit dust generation. Water is applied as necessary but it is usually not needed at all transfer points. In rare cases, when the material is unusually dry and water application is needed at all transfer points during the off loading process water will be applied by hand if necessary to prevent a reoccurrence.

Please let me know if you have any further question.

Yours truly,



Gerald J. Brown  
Manager Safety and Environment

Copy: Henrik Voldback

AGCS2M000721

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

September 17, 1998

Ms. Melissa McAfee  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Compliance Status Report

Dear Ms. McAfee:

You requested information on causes and corrections for emissions observed over the clinker silos on August 14, 1998.

The emission was caused by a faulty high-level bin indicator which lead to over filling the hydrated lime tank. The bin high level switch has been repaired.

As you are aware, we have been in the process of installing load cells on the lime tank for determining volume. Electrical wiring and structural modifications to X-bracing on the tank have been completed. The project will be completed with the placement of the load cells. Following testing, the system should be completely functional within 2-3 weeks.

Yours truly,

Gerald J. Brown  
Manager Safety and Environmental

Copy: HV  
MD

AGCS2M000722



Seattle Plant

**facsimile**

TRANSMITTAL

to: Melissa McAfee PSAPCA

fax: 343-7522

re: CSR

date: Thursday September 17, 1998

Number of pages including this page: 2

Following is the information you requested. I am sorry for the delay.

If you need further information please call.

Jerry

From the desk of ...

**Gerald J. Brown, CSP**  
Manager Safety and Environmental  
Ash Grove Cement Company  
3801 E. Marginal Way So.  
Seattle, WA 98134

(206) 694-6221  
fax: (206) 623-5355

AGCS2M000723